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Attorney for Defendant Max Joseph Plog-Horowitz

United States District Court
Northern District of California
Oakland Division

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAX JOSEPH PLOG-HOROWITZ

Defendant.

Case No. 4:12-cr-00661-CW-1

**STIPULATION AND [PROPOSED] ORDER
MODIFYING CONDITIONS OF RELEASE**

STIPULATION MODIFYING CONDITIONS OF RELEASE

Mr. Plog-Horowitz was previously released from electronic monitoring and allowed to travel to Little Rock, Arkansas. He was expected to return today, January 3, 2013. Mr. Plog Horowitz was hospitalized in the early hours of this morning for a hernia and is scheduled for surgery at 9:00 a.m., Friday, January 4, 2013. Defense counsel spoke with his emergency room doctor, Dr. Isaacson, who stated that Mr. Plog Horowitz will not be cleared for airplane travel until Monday, January 7 or Tuesday, January 8, 2013. The parties below agree and stipulate that under the circumstances, Mr. Plog Horowitz' travel may be extended until he is medically cleared to travel, which is expected to be on or about January 9, 2013. It is further stipulated that Mr. Plog Horowitz will maintain contact with the Office of Pretrial Services, as feasible, during this extended period.

1 Accordingly, it is requested and agreed that Mr. Plog-Horowitz' release conditions shall be modified to
2 permit him to remain in Little Rock, Arkansas until he is medically cleared for travel, which is expected
3 to be on or about January 9, 2013, and that Defendant will maintain contact with the Office of Pretrial
4 Services, as feasible, during this extended period.

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6 **IT IS SO STIPULATED.**

7

8 January 3, 2013

9 Date

/s/ ACB

ANNE C. BELES,
Attorney for *Defendant*

10 January 3, 2013

11 Date

/s/ JCM

JAMES C. MANN,
Assistant U.S. Attorney

13 January 3, 2013

14 Date

/s/ VG

VICTORIA GIBSON,
U.S. Pretrial Services

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18 **IT IS SO ORDERED.**

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20 Dated: 01/04/13

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HONORABLE KANDIS WESTMORE
United States Magistrate Judge
Northern District of California